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Total Number of Pages in This Submission: 13

Application Number	09/837,632
Filing Date	April 19, 2001
First Named Inventor	Jesse Perla
Art Unit	2144
Examiner Name	Tam T. Phan
Attorney Docket Number	EXTS128

ENCLOSURES *(Check all that apply)*

- ☐ Fee Transmittal Form
  - ☐ Fee Attached
- ☐ Amendment/Reply
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  - ☐ Affidavits/declaration(s)
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	
Jesse Perla	Attorney Docket Number: EXTS128
Serial No: 09/837,632	Group Art Unit: 2144
Filed: April 19, 2001	Examiner: Phan, Tam T.
For: AN ERROR HANDLER METHOD AND SYSTEM FOR INTERNET-BASED APPLICATIONS	

APPELLANTS'/APPLICANTS' OPENING BRIEF ON APPEAL

1. REAL PARTY IN INTEREST.

The real party in interest is Extended Systems, Inc, a corporation established under the laws of the State of Delaware and having a principal place of business at 5777 North Meeker Avenue Boise, Idaho 83713.

2. RELATED APPEALS AND INTERFERENCES.

There are no other appeals or interferences known to Appellants, Appellants' legal representative or the Assignee which will affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

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3. STATUS OF CLAIMS.

Claim 1 is pending and stands rejected. All pending claims are appealed.

4. STATUS OF AMENDMENTS.

Claim 1 has not been amended.

5. SUMMARY OF CLAIMED SUBJECT MATTER.

Claim 1 recites a method for generating error messages in a web based application. The method includes searching said application for a predetermined error number. An error number corresponding to the error message is retrieved. The error message is applied to a style sheet in an error form. The error form is then displayed on a requesting device. *See, e.g.*, Specification, page 18, line 11 through page 22, line 32 and Fig. 12.

6. GROUNDS FOR REJECTION TO BE REVIEWED.

A. The Examiner has failed to establish a prima facia case for obviousness in that Praitis and Bridgman, individually and combined, do not teach or suggest applying an error message to a style sheet in an error form as recited by Claim 1.

B. The Examiner has failed to establish a prima facia case for obviousness in that Miksovsky and Hind, individually and combined, do not teach or suggest applying an error message to a style sheet in an error form as recited by Claim 1.

7. ARGUMENT.

A. Ground for Rejection A (Claims 1) – The Examiner has failed to establish a prima facia case for obviousness in that Praitis and Bridgman, individually and combined, do not teach or suggest applying an error message to a style sheet in an error form as recited by Claim 1.

The Examiner rejected Claim 1 under 35 USC § 103 as being anticipated by USPN 6,594,697 issued to Praitis in view of USPN 6,523,062 issued to Bridgman. Claim 1 is

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directed to a method for generating error messages in a web based application and recites the following acts:

(a) searching said application for a predetermined error number;
(b) retrieving an error message corresponding to said error number;
(c) applying said error message to a style sheet in an error form; and
(d) displaying said error form on a requesting device.

Rejecting Claim 1, the Examiner admits that Praitis does "not expressly teach applying said error message to a style sheet in an error form." For this, the Examiner relies on Bridgman stating that "Bridgman disclosed a method of applying an input message document [error message] to an Extensible Stylesheet Language style sheet in an output document [error form] to transform the document from one type to another (i.e. transforming an XML document to a WML document) when presenting the output document to handheld devices that have limited memory and storage as well as limited display space (column 1 lines 56-column 2 lines 7, column 2 lines 29-65).

Contrary to the Examiner's assertions, Bridgman does not teach or suggest applying an error message to a style sheet in an error form in the manner recited by Claim 1.

First, the section of Bridgman relied upon by the Examiner is reproduced as follows.

> WML is specifically designed for the limitations that are often inherent in the client devices used in the mobile, or wireless, computing environment. Client devices common in this environment include cellular phones, screenphones, pagers, and laptop computers. While laptop computers may be nearly equivalent in features and capabilities to non-mobile computing devices such as desktop computers, many of the other devices used in the wireless environment tend to be small, handheld devices that have limited memory and storage, as well as limited display space. Section 4.5, "Device Types", of the WML specification provides a description of the characteristics of devices for which WML was designed. These characteristics include small display screen size, with low resolution; limited user input facilities; low power CPUs and small memory size; and capable of supporting only low bandwidth connections, therefore resulting in high latency. An example of this type of device is the Nokia 7110, a WAP-enabled cellular phone with a

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> maximum display area of 6 lines of text. Another example device is the WorkPad available from the International Business Machines Corporation ("IBM"). This device is a handheld computer typically configured with several megabytes of storage, where that storage is as Random Access Memory ("RAM") to avoid the system overhead associated with other types of storage such as disk drives. ("WorkPad" is a registered trademark of IBM.)

Bridgman, col. 1, lines 56 through col. 2, line 14.

> Authors creating documents as WML decks typically create the decks to be small in size, to accommodate the memory and processing limitations inherent in the target client devices. However, problems often arise when a user of a WAP-enabled device requests a document that was not created specifically with the wireless device limitations in mind. For example, it is becoming commonplace for XML documents (created irrespective of the client device) to be transcoded or otherwise transformed for downloading. When the target device is a relatively powerful machine with a large storage capacity such as a desktop computer, then downloading the XML document is unlikely to create problems. However, when the target device is a constrained device, then there may not be sufficient space for receiving and storing the document on the device. In addition, the processing capabilities of a constrained device may be insufficient for a document created without regard to the limitations of these devices.
>
> Extensible Stylesheet Language ("XSL") style sheets provide an efficient means of filtering documents (such as XML documents), by defining translations on an input document that create only a specific set of desired document elements in the resulting output document. As is known in the art, a "style sheet" is a specification of a style that is to be used when presenting a document. Style sheets may also be utilized to describe transformations from one document type to another, such as transforming an XML document to a WML document. Style sheets may also be used as filters which describe transformations to reduce the amount of document content while maintaining the original document type. However, XSL style sheet filtering does not provide a means for limiting the size of the output document. WML decks in excess of 1 kilobyte in size may overload a constrained storage device, leading to undefined behavior when the device attempts to process the deck. From a user's perspective, it is unacceptable to allow this undefined behavior to occur.

Bridgman, col. 2, lines 29-65.

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Nothing in this section teaches applying an error message to a style sheet in an error form in the manner recited by Claim 1. For at least these reasons, the Examiner has failed to establish a prima facia case for obviousness. Consequently, Claim 1 is patentable over Praitis and Bridgman.

B. Ground for Rejection B (Claim 1) – The Examiner has failed to establish a prima facia case for obviousness in that Miksovsky and Hind, individually and combined, do not teach or suggest applying an error message to a style sheet in an error form as recited by Claim 1.

The Examiner rejected Claim 1 under 35 USC § 103 as being anticipated by USPN 6,526,529 issued to Miksovsky in view of USPN 6,585,778 issued to Hind. Claim 1 is directed to a method for generating error messages in a web based application and recites the following acts:

(a) searching said application for a predetermined error number;
(b) retrieving an error message corresponding to said error number;
(c) applying said error message to a style sheet in an error form; and
(d) displaying said error form on a requesting device.

The Examiner admits that Miksovsky does "not expressly teach applying said error message to a style sheet in an error form." For this, the Examiner relies on Hind stating that "Hind disclosed a method of applying the error message to a style sheet in an output document [error form] (Abstract, Figures 2-4, 7, column 7 lines 19-50, column 7, line 65-column 8 line 57)." Furthermore, the Examiner, citing Miksovsky, col. 2, line 63-column 3, line 6, asserts that Miksovsky suggests "exploration of art and/or provided a reason to

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modify the method with the style sheet feature to display output documents for used with hand-held devices."

Contrary to the Examiner's assertions, Hind does not teach or suggest applying an error message to a style sheet in an error form in the manner required by Claim 1, and Miksovsky does not suggest or provide any motivation to modify its teachings. First, the sections of Bridgman relied upon by the Examiner is reproduced as follows.

> Enforcing data policy using style sheet processing. A Document Type Definition (DTD) associated with an Extensible Markup Language document is modified to specify a reference to stored data policy to be applied to document elements. Each data element may specify a different data policy. This technique uses minimal network transmission overhead, as the policy itself is not transmitted through the network until the DTD reaches the node where the data policy will be applied. Programming code implementing the data policy is then retrieved, using the references, by an Extensible Stylesheet Language (XSL) processor instrumented according to the present invention. Data policy is preferably enforced by overriding the existing XSL "value-of" method. DTD information describing a document element may be suppressed from a DTD being generated for the output document of the data policy enforcement process, providing privacy protection for the details of the associated policy.

Hind, Abstract.

> The present invention defines a novel technique for enforcing data policy in a distributed network computing environment using style sheet processing. Preferably, this processing occurs at an intermediary in the delivery chain between a client who has requested stored data and the server application which has retrieved the requested information. Intermediaries commonly apply various types of translations and/or transformations based upon target context. For example, the Extensible Markup Language (XML) is widely adopted as an industry standard for the publishing and exchange of data through networks such as the Internet. When data is being transmitted in the form of an XML document, a common translation is to reformat the document into a different markup language, where the target markup language is better suited to the target context. Suppose the requesting user Sam from the previously-discussed example has requested data from his cell phone over a wireless connection. In this case, the target context comprises the user Sam; his limited-function, constrained device, the wireless network connection; and the browser or other application software from which Sam issued his request. It may be determined that Sam's browser does not support XML, but does support WBXML ("Wireless Application Protocol Binary XML"), which is a compact binary representation of XML developed for the purpose of document presentation for users of wireless computing devices. Thus, the

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intermediary would perform an XML to WBXML translation, and send the resulting WBXML document to the requesting user Sam. A typical means of performing this type of translation, as well as many other translations and transformation, is by applying a style sheet to the input document.

Hind, col. 7, lines 19-50.

A "style sheet" is a specification of a style that is to be used when presenting a document. The style specification includes information such as the font and margins to be used, the formatting layout, and other types of information that indicate how the presented document should appear. Style sheets may also be utilized to describe transformations from one document type to another (e.g. from XML to WML) or as filters which describe transformations to reduce the amount of content while maintaining the original document type.

One type of style sheet is an XSL Style Sheet. XSL Style Sheets are style sheets specified in XSL, which is a particular style sheet language. "XSL" is an acronym for "Extensible Stylesheet Language". An XSL Style Sheet specifies how an XML document is to be transformed, resulting in a different document which may or may not maintain the original document type. (Refer to "Extensible Stylesheet Language (XSL), W3C Working Draft 21 April 1999", referred to hereinafter as "the XSL Specification", and "XSL Transformations (XSLT), Version 1.0, W3C Working Draft 9 July 1999", which are available on the Web from the World Wide Web Consortium, or "W3C", for more information on using XSL for formatting and transforming documents)

Style sheets include "template rule" constructs, which define an input pattern and a template (also known as an "action") to use in creating an output result tree fragment. When applying a style sheet, the patterns in the template rules are matched against the syntax of the source document. When a match is found with the pattern, an output document fragment is created according to the actions specified in the template (which may include processing additional elements in the source document beyond the matching element). The source document is parsed recursively, until no more matching patterns are found. The resulting document fragments are then aggregated to yield a complete output document. (For more information on this process, refer to section 2, "Tree Construction", in the XSL Specification.) It is this template rule matching and substitution of different document elements according to the actions in the matching rules that enables style sheets to transform documents.

Style sheets may be written to search for and extract a specific subset of the information contained in an XML document. Or, a style sheet might tailor the information so that it can be delivered to a particular device, transforming the document for the characteristics of the device (such as

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> which browser will be used to render the document, the screen size of the device, whether the screen supports color or grayscale, etc.). These techniques are well known in the art. (While the term "document" is used herein when discussing encoded data and application of style sheets thereto, it is to be understood that the information on which a style sheet operates may represent any type of information, and is not limited to the traditional interpretation of the word "document". As one example, a style sheet may be used to process an encoded representation of records from a data repository which specify a company's sales data. As another example, a style sheet may be used to format employee information retrieved from a corporate database for presentation. For ease of reference, the term "document" will be used herein to refer to these diverse types of information.)

Hind, col. 7, line 65 through col. 8, line 57.

While these sections discuss style sheets, they do not teach or suggest applying an error message to a style sheet in an error form in the manner recited by Claim 1. For at least these reasons, the Examiner has failed to establish a prima facia case for obviousness. Consequently, Claim 1 is patentable over Miksovsky and Hind.

Respectfully submitted,

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APPENDIX OF CLAIMS INVOLVED IN THE APPEAL

1. A method for generating error messages in a web based application, said method comprising the steps of:
   (a) searching said application for a predetermined error number;
   (b) retrieving an error message corresponding to said error number;
   (c) applying said error message to a style sheet in an error form; and
   (d) displaying said error form on a requesting device.

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EVIDENCE APPENDIX

There is no extrinsic evidence to be considered in this Appeal. Therefore, no evidence is presented in this Appendix.

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RELATED PROCEEDINGS APPENDIX

There are no related proceedings to be considered in this Appeal. Therefore, no such proceedings are identified in this Appendix.

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